## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

ANGELICA B. SMITH,	<b>§</b>
	<b>§</b>
Plaintiff,	<b>§</b>
	<b>§</b>
V.	§ CIVIL ACTION NO. 4:22-CV-02472
VALVOLINE, LLC,	<b>§</b>
VALVOLINE, LLC,	<b>§</b>
Defendant.	<b>§</b>
Determant.	<b>§</b>

## **NOTICE OF SETTLEMENT**

Pursuant to Local Rule 16.3 and Section B(6) of Judge Bennett's Court Procedures and Practices, Plaintiff Angelica B. Smith and Defendant Valvoline, LLC hereby provide notice to the Court that the parties have reached a settlement in principle in this matter. Accordingly, the parties jointly request that the Court stay all Court proceedings and deadlines, including the upcoming trial that is set to begin on or after March 4, 2024. The parties are in the process of drafting a settlement agreement and anticipate filing a Stipulation of Dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) within forty-five (45) days.

Dated: February 15, 2024 Respectfully submitted,

By: /s/ Kevin M. Gross (with permission)

Kevin M. Gross Ohio Bar No. 0097343 Admitted pro hac vice kgross@zipkinwhiting.com

Lewis A. Zipkin
Ohio Bar No. 003068
Admitted pro hac vice
lawsmatter2@gmail.com
ZIPKIN WHITING CO. LPA
3637 South Green Road
Beachwood, OH 44122
216.514.6400 (Telephone)

ATTORNEYS FOR PLAINTIFF ANGELICA B. SMITH By: /s/ Jeremy W. Hawpe

Jeremy W. Hawpe (Attorney-in-Charge)

Texas Bar No. 24046041

jhawpe@littler.com

Courtney E. Jackson (Of Counsel)

Texas Bar No. 24116560 cejackson@littler.com

LITTLER MENDELSON, P.C.

2001 Ross Avenue

Suite 1500, Lock Box 116 Dallas, TX 75201-2931 214.880.8100 (Telephone) 214.880.0181 (Facsimile)

ATTORNEYS FOR DEFENDANT VALVOLINE, LLC

## **CERTIFICATE OF SERVICE**

On February 15, 2024, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Southern District of Texas using the Electronic Case Filing system of the Court. I hereby certify that I have served the following:

Lewis A. Zipkin Kevin M. Gross The Zipkin Whiting Bldg 3637 South Green Road Beachwood, OH 44122 lawsmatter2@gmail.com

kgross@zipkinwhiting.com

Pro Hac Vice Counsel for Plaintiff Angelica B. Smith

/s/ Jeremy W. Hawpe Jeremy W. Hawpe